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321 Old Suman Road  
Valparaiso, IN 46383  
December 10, 1993

Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

DEC 20 1993

FCC - MAIL ROOM

Dear Sir:

I wish to formally submit a Petition for Rule Making to restructure the amateur radio technician class licenses so as to eliminate present ambiguity in its classification, as per FCC 1.51.

Enclosed you will find the required copies of this petition. Additionally, copies have been circulated to my congressmen and appropriate publications.

If you have any questions please do not hesitate to contact me.

Thank you.

Very truly yours,

*Vern A. Weiss*

Vern A. Weiss

Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION

In the matter of

Eliminating ambiguity  
from the amateur radio  
license technician classes.

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Petition for Rule Making

1. Two years ago through the adoption of PR Docket 90-55 the Federal Communications Commission eliminated its existing Amateur Radio Technician class license and established two licenses to replace it. The new license was established primarily to accommodate people unable or unwilling to meet the long-standing examination requirement of amateur radio operators to possess knowledge of Morse code. This "no-code" license, as it was called, was created to provide an entry gateway giving access to some limited amateur radio frequencies. It was thought computer enthusiasts whose interest did not follow the traditional role of amateur operators needed the frequency spectrum for their computer networking and experimentation. The Commission classified this no code license as a "Technician" license and reserved the name, "Technician Plus" for those fulfilling all of the traditional examination requirements including demonstration of Morse code knowledge. While significant limitations are attached to those holding the "Technician" class license when compared to the "Technician Plus" license, there remains only the slight license nomenclature of "Technician" versus "Technician Plus" to differentiate the two.

2. Since the easier "Technician" license without a Morse code requirement has been implemented, there has been a large influx of operators opting for this license. According to the American Radio Relay League, an organization representing many amateur radio operators, the swelled numbers of Technician class licensees has been good for the amateur service. The intensive computer experimentation they thought would occur has not materialized and, in fact, most are following the traditional roles of their "Technician Plus" counterparts.

3. The unclear line between the two license classes is causing increased confusion. Amateur radio operators, who have long prided themselves in self policing their service are finding these two license classes with very similar names but very different privileges difficult to identify. To complicate this situation, no official delineation is recorded and both licenses are published only as "Technician" class.

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Furthermore, some holders of the lesser "Technician" license are reported to be using this ill-defined license

difference to their advantage and enjoy the privileges of the "Technician Plus" license freely since their privilege restrictions are difficult to detect.

Some reports have surfaced that even the Commission's own monitoring/enforcement efforts are complicated due to the similarity license name but very clear privilege disparity.

4. It would seem reasonable that a license class created to permit people access to otherwise inaccessible frequency spectrum should not be identified with essentially the same word as a license requiring additional examination requirements being met and allowing full privileges.

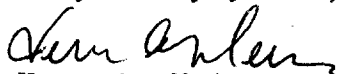
5. For many years the Commission maintained a commercial licensing structure based around licenses known as "First Class Radiotelephone" and "Second Class Radiotelephone" license. Then it was determined that operators who passed a simpler examination could be given access to radio station operation. Wisely, the Commission designated this provisional license that was similar to the no-code license in that it was very restrictive, "Third Class Radiotelephone Permit." There was no attempt to obscure that this provisional access permission the Commission granted should be construed as full authority such as that given to full "First" or "Second" class licensees. It was only to be treated as conditional and restrictive permission as is what the no-code amateur "Technician" holders were being given since they did not have to fulfill the full requirements of holders of all the other amateur license classes.

6. In view of the above reasons, I respectfully petition the Federal Communications Commission to amend Part 97 of its Rules and Regulation for the amateur radio service to rename the present "Technician Plus" license, simply "Technician."

I further petition the Commission to rename and redesignate the present no-code Technician license, "Amateur Permit." If the Commission is unmoved by the name "Amateur Permit," I request consideration being given to a similar license name conveying this certificate as a "Permit" versus a license.

Additionally I request this proposal be made available for public comment.

Very truly yours,



Vern A. Weiss  
321 Old Suman Road  
Valparaiso, Indiana 46383

10 December 1993